

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

Dianna hysius

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

See attached

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

**Complaint for Violation of Civil Rights**

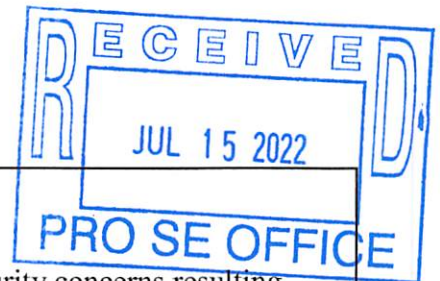
(Non-Prisoner Complaint)

Case No. 21-CV-7001

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

Amended  
Complaint



NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

**PHILIPPE KNABB**

◦ **NERMINA ARNAUD**

◦ **SAPNA RAJ**

◦ **JOHN B. SPOONER**

**CARMALYN MALALIS**

**ZOEY CHENITZ**

◦ **CITY OF NEW YORK**

**NEW YORK CITY COMMISSION ON HUMAN RIGHTS**

**NEW YORK CITY LAW DEPT. on behalf of RESPONDENT as SUPERIOR**

**HOLLY ONDAAN**

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Dianna Lysius  
1280 Croton Hoop 13B  
Brooklyn, Kings  
New York, 11239  
(646) 210-7747  
lysiusd@yahoo.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

Philippe Knabb  
Staff Supervising Attorney  
400 Church Street  
New York, New York  
New York, 10007  
(347) 526-3027  
Philippe.Knab@gmail.com

Defendant No. 2

Name

Nermiina Arnaud

Job or Title  
(if known)

Staff Attorney, formerly CCHR

Street Address

55 Water Street, 23rd floor

City and County

New York, New York

State and Zip Code

New York 10041

Telephone Number

(212) 815-1140

E-mail Address  
(if known)

Defendant No. 3

Name

Holly Ondaan

Job or Title  
(if known)

Street Address

143-19 Rockaway Blvd

City and County

Jamaica Queens

State and Zip Code

Queens NY 11434

Telephone Number

(718) 813-6208

E-mail Address  
(if known)

Vixenh32@yahoo.com

Defendant No. 4

Name

Sapna Raj

Job or Title  
(if known)

Deputy Commissioner, NUCCHR  
Enforcement Division

Street Address

~~100~~ ~~25~~ 25 Reade Street

City and County

New York, NY

State and Zip Code

New York 10007

Telephone Number

(212) 416-0199

E-mail Address  
(if known)

Sraj@nycchr.nyc.gov

Defendant No. 5-

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

John B. Spooner  
Administrative Law Judge  
100 Church Street, 12th floor  
New York, NY  
New York 10007

Defendant No. 6

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

City of New York  
Respondents Represented  
100 Church Street  
New York NY  
New York 10007  
Gmackie@law.nyc.gov  
dbernhar@law.nyc.gov  
ServiceECF@law.nyc.gov

Defendant No. 7

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

New York City Law Dept  
on behalf of respondents as Superior  
100 Church Street  
New York NY  
New York 10007  
Gmackie@law.nyc.gov  
dbernhar@law.nyc.gov  
ServiceECF@law.nyc.gov

Defendant No. 8

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

New York City Commissioner  
City of New York Agency

22 Reade Street

New York NY

NY 10007

(212) 416-0199

Defendant No. 9

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

Zoly Cherik

Senior Corporate Counsel, CCH

100 Church Street,

New York, NY

New York 10007

(212) 416-0199

Defendant No. 10

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

Carmalyn Malalis,

Agency Commissioner

100 Church Street

New York, NY

New York 10007

(212) 416-0199

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ State or local officials (a § 1983 claim)  
☐ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1st Amendment - Defamatory; False Statements  
8th Amendment - Deprivation / Cruel Punishment  
5th / 14th Amendment - Due Process; Substantive & Procedural  
6th / 7th Amendment - Important Trial Procedures; Depose Others

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See attached detailed statement how ALL Parties acted beyond the boundaries of the law while violating my Civil Rights. City of New York is liable under Section 1983 as I was deprived of my rights, privilege, & immunities specifically that are secured under the Constitution. The employees acted under direction of their employer.

### **Basis for Jurisdiction**

**D. Section 1983, 42 U.S.C. explanation of how each defendant (ALL PARTIES) acted under color of state or local law as follows. The detail below provides a clear outline about how New York City Commission on Human Rights & New York State Supreme Court, Judge Kevin Kerrigan acted beyond the bounds of lawful authority as outlined in the United States Constitution.**

### **NEW YORK CITY COMMISSION ON HUMAN RIGHTS**

New York City Commission on Human Rights employee Philippe Knabb filed a discrimination complaint against me, the petitioner that was followed by an Administrative Trial (non-jury). The complaint alleged that I Dianna Lysius, sent discriminatory text messages to Holly Ondaan during the month of January 2018. NYC Commission on Human Rights proceeded with a 2-day trial during the month of May 2019 & June 2019 and subpoenaed my personal Sprint phone records as evidence to confirm whether the alleged text messages were sent from my phone. For approximately 18 months I continuously reiterated that I did not send the alleged text messages. After a full review of my Sprint phone records, subpoenaed by New York City Commission on Human Rights, and entered evidence by both parties (complainant/respondent-myself) it was CONFIRMED that the alleged text messages outlined in the complaint were **NOT** sent from my phone. I continuously informed Philippe Knabb and all parties that I never sent the discriminatory text messages prior to trial. In addition, my defense that the entire matter was a MALICIOUS Immigration Fraud Scheme at the hands of Philippe Knabb, Supervising Attorney for the Commission on Human Rights and Holly Ondaan an inadmissible person who sought loopholes and eventually obtained a green card under false pretenses. Judge John B. Spooner whose signature appears on the Report & Recommendation which was used to write the false decision that defamed my character and hindered my freedom to a normal life, obtaining employment, etc. Which is a violation of my **1<sup>st</sup> Amendment rights under the Constitution** by local officials of the State of New York and City of New York. The email sent September 16, 2019, by Judge Spooner confirmed not only he did not write the Report & Recommendation, but the Federal Government was aware that the Judge did not write the recommendation in the report as well.

The trial Judge John B. Spooner, with knowledge of the immigration fraud scheme informed Department of Homeland Security, Washington, DC who thereafter, reported the matter to the United States Customs and Immigration Office in Vermont, NY for investigation as they too confirmed the immigration fraud. Please see attached Judge John B. Spooner's email on September 16, 2019, and my personal Sprint phone record of incoming calls from both Department of Homeland Security, Washington, DC, and United States Customs & Immigrations Services, Vermont, NY. During the phone call with the Federal Agent from USCIS he informed me to present the matter to State Court of which he is aware of City of New York's corruption that will lead to my case being dismissed. However, he assured me to follow all the way through to United States Eastern District Court and file a complaint informing the Federal Court Judge that he awaits all requests and support documentation used by New York City Commission on Human Rights & The Legal Aid Society Attorney's to falsified documents which led to Holly Ondaan obtaining a Green Card under false pretense in conjunction with New York City Commission on Human Rights. He further explained that Philippe Knabb began processing the USCIS Fraudulent Application prior to January 2018, the dates of the alleged discriminatory text messages and ran into a roadblock which led to me becoming the sacrificial lamb; false complaint alleging discriminatory text messages.



Above all, the USCIS Federal Agent BLAINTLY outright informed me of the exact scheme the was done and assured me that I am due to be compensated for civil damages from City of New York and be sure to file my New York State Supreme Court and/or present the matter to US Eastern District Court as he awaits ALL REQUESTS. He stated that because my name is on record with the fraudulent application filed with USCIS and I am entitled to have a copy of all documents pertaining my name and he awaits the subpoena to furnish the information in my defense. Also, the Agent asked me if I am willing to testify against New York City because this is a continued bad practice by lawyers specifically the attorneys at The Legal Aid Society as they were already addressed for such practices numerous times with no regard for the lives they damage.

On the day the Report and Recommendation went public, Judge John B. Spooner emailed informed me that await the final decision and I must "appeal" the decision. Minutes later, Department of Homeland Security, Washington, DC called my cell phone informing me that they are aware of the fraud scheme and the matter has been referred to the United States Customs and Immigration Services Office in Vermont, NY. The DHS Agent informed me that a USCIS agent will be calling me shortly and I should keep my lines clear because she called twice before finally reaching me. Within minutes, I received the phone call from the USCIS Federal Agent assigned to the case by Department of Homeland Security, Washington, DC. The USCIS Agent, conducted an interview and informed me of the fraud and directed me that they are aware, and the matter is being investigated. The Agent proceeded to inform me that City of New York will make it difficult for me to obtain legal representation, he stated be careful of the lawyer that I retain because they all are connected and will damage my case, which I did experience as detailed in the statement of claim, section B.

As I hired an attorney by the name of Jonathon Rosenberg to respond to Report & Recommendation prior to the final decision I informed him that he must not take part in any of the misconduct. He assured me he would not, but he did. Mr. Rosenberg dismissed me as a client on the very last day the Special Proceeding due date was altered from 120 days to 30 days to assist in the Fraud Scheme leading to the defamation of my character. These acts all together were committed by City of New York Employee where the law confirms the employer is Superior and Liable for the acts of their former or current employees while acting in the capacity of their employment. City of New York directed the employees to do this which is confirmed by Mr. Knabb in a recorded conversation, as he states the City of New York directed him to conceal fraud and violate my Civil Rights.

In November 2020, Zoey Chenitz, Corporate Counsel and Carmelyn P. Malalis Commissioner, for New York City Commission on Human Rights acted under color of law by acting beyond boundary of lawful authority by rendering a decision/order of guilt by denying me, Dianna Lysius, the petitioner my equal protection under the 42 U.S.C. 1983 specifically, **14<sup>th</sup> Amendment Due Process Clause. A Federal Offense which I ask United States Easter District Court ANSWER. Does the constitution protect and enforce the due process rights of a person who is accused of an offense whether civil or criminal? If so, was I treated fairly and equally when not afforded the right to depose/question my adversary prior to trial? Is it Constitutional that my evidence not only be stolen during trial after being submitted by Judge Spooner a normal practice under the Constitution, to only avoid discussing the submission of such evidence during deciding on the matter? After one proves his/her innocence, is that innocence taken to accuse an innocent person only falsely? Did the Supreme Court Judge err in disregarding these Major Civil Rights Violations and failed to litigate a normal practice under the law?**

**I ask that while answering the above Federal Questions are answered the application of the Younger Abstention exceptions allows for the United States Eastern District Court to address the matter by intervening because of bad faith, harassment in my life, and above all the extraordinary circumstance of the commission of immigration fraud presented and confirmed by USCIS Federal Agents who are moving to prosecute for a total of 650 plus illegal green cards issued fraudulently.**

**My life matters but rendering a decision by shifting the blame is detailed in the trial transcripts.**

The decision was rendered arbitrary and capricious, knowingly with malicious intent by referencing Judge John B. Spooner's Report & Recommendation of which the trial transcripts confirmed the Judge did not support the decision. Furthermore, on November 25, 2020, the day Ms. Chenitz and Ms. Malilis issued the decision, Judge John B. Spooner immediately RESIGNED/RETIRED from his position of over 20 plus years because he too was upset and not in agreeance with what was being done to me. The Judge was already informed by confirmation from United States Department of Homeland Security in Washington, DC that the commission of fraud did exist. New York City Commission on Human Rights issued a decision citing they used the Report and Recommendation from the Trial of Judge John B. Spooner is beyond false. Judge Spooner email on September 16, 2019, indirectly gives me direction on how to proceed, as well as, confirming he did not write the decision by stating the Report & Recommendation is NOT A FINAL DECISION, NYCCHR will WRITE THE FINAL DECISION and I should "APPEAL", followed by a phone call from DHS and USCIS who to confirmed Immigration Fraud.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

115-21 148th St  
Queens NY 11436

NYC Law Dept 100 Church  
NY 10007  
NY Supreme Court 88-11 Sutphin Blvd  
Queens NY 11435  
NYCCHR 25 Rade Street NY 10007  
City of New York 100 Canal Street NY NY  
Oath Fed Church Street NY NY 10007

B. What date and approximate time did the events giving rise to your claim(s) occur?

The Civil Rights Violations began as  
early as August 2017 and  
continued to date as I am fighting  
the matter in Supreme Court. See detail

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Please see attached detail  
statement the timeline of events  
that commenced on or about  
August 2017 and continued at  
the hands of all defendants  
named in the complaint to  
include Supreme Court Judge  
Kevin Kerrigan who had the  
authority to litigate but to  
do so. So I present my claims  
to ensure that I receive fair  
treatment and urgent intervention  
from the federal courts to stop  
the harassment and abuse. I ask  
the courts to invoke the 3  
specific exceptions to the Younger  
Abstention Doctrine; Harris 42 US.

## **NEW YORK STATE SUPREME COURT JUDGE KEVIN KERRIGAN – JUDICIAL REVIEW OF AGENCY DECISION**

On March 25, 2021, I proceeded to New York State Court Supreme Court, County of Queens and filed a petition REQUESTING JUDICIAL INTERVENTION – Article 78 Special Proceeding to present the Fraudulent Decision/Order rendered by New York City Commissioner on Human Rights. The Special Proceeding was assigned to Judge Kevin Kerrigan for Review & Adjudication. G. Mackie, Attorney with New York City Law Dept., responded on behalf of New York City Commission on Human Rights and denied all the allegations & presented an affirmative defense stating the statute of limitations had expired on the decision that Zoey Chenitz should NEVER have written while having clear knowledge that her employee subpoenaed my Sprint phone records that confirmed my innocence. During the trial I proved my innocence upon review of the subpoenaed phone records and trial transcripts will confirm that Judge John B. Spooner clearly confirmed my innocence. Ms. Chenitz/Carmelyn Malalis writing the decision violated my rights as the decision is based on the Report & Recommendation that does not discuss the Sprint phone records which was entered into evidence and reviewed by Judge Spooner which confirms the Report & Recommendation WAS NOT written by the Judge. Impartial treatment during trial proceeding, failure to afford due process by denying me to depose adversary, is a direct deprivation of my civil rights.

However, the Report and Recommendation should have been written based upon the trial transcripts which the review of the transcripts by any Judicial Authority too will conclude that Judge Spooner did write the Report & Recommendation, and if so, Judge Spooner did not utilize the trial transcripts or exhibits entered into evidence to write the Report & Recommendation. This too would confirm that such acts are beyond the lawful authority under United States Constitution.

Carmelyn P. Malalis, Commissioner of the Commission on Human Rights in cahoots with NYC Office of Administration Trial & Hearings Commissioner work together to cover up the corruption. OATH renders a Report & Recommendation in favor of NYC Commission on Human Rights without referring to the Sprint Phone Records and has Judge John B. Spooner sign off. Judge Spooner then sends me an email letting me know that the FINAL DECISION will be made by New York City Commission on Human Rights, and I should appeal the decision. Thereafter, Zoey Chenitz renders a decision referring to the Report & Recommendation disregarding all evidence specifically the Sprint phone records which is the KEY EVIDENCE in the matter subpoenaed by Zoey Chenitz office.

Above all, New York City Commission on Human Rights denied me the right to depose the complainant, during trial soon after being entered into evidence the attorneys stole my exhibits. **Specifically, the NYPD – Police Reports were stolen from both Phillippe Knabb and Nermina Arnaud the attorneys that put me on trial for fraud which they committed in violations set forth by the United States Department of Homeland Security Regulations to assist an INADMISSIBLE person into the United States. A fact that cannot be argued by any party because both Department of Homeland Security and United States Customs and Immigration Services contacted me confirming the fraud on the very day the Report & Recommendation was issued prior to the Final Decision by Zoey Chenitz. This too is the reason why G. Mackie on behalf of Commission on Human Rights denies all allegations. Not only did the EMPLOYEES of New York City violated my rights but Judge Kevin Kerrigan did to as well by overlooking all my evidence, discussions, and motions for equitable tolling because of my attorney's misconduct.**

Judge Kerrigan rendered a decision in favor of New York City stating that the petition was filed untimely, although he was aware of the misconduct with the attorney which I hired to respond to the Report & Recommendation. Jonathan Rosenberg, the attorney who represented me for a short time responded to the Report & Recommendation which was followed by the final agency decision that was delayed for 11 months and SHOULD HAVE been written in my favor but was NOT. The response from Mr. Rosenberg clearly addressed the evidence and trial transcripts confirmed my innocence and the decision MUST be rendered in my favor as outlined in the U.S.C. With no regard to my life as a human being the decision was served upon myself and Jonathon Rosenberg on November 25, 2020, via email from Zoey Chenitz, Counsel for NYCCHR knowingly with knowledge of wrongdoing, not only to me, but in violation of the 42 USC 1983, acting under color of law only because she has a personal relationship with Judge Kevin Kerrigan and was aware that the decision would get dismissed for 2 reasons.

The first reason being, my attorney Jonathon Rosenberg dismissed me as his client for no apparent reason which I owed no money nor had a bad relationship on the very day the petition was to be filed in Supreme Court. Mr. Rosenberg appears to have a relationship with the staff at Legal Aid Society and the Green Card application was processed by the Attorney's a total of 6 months prior to the alleged text messages from Mr. Philippe Knabb. During this time, Mr. Knabb was the Supervising Staff Attorney at the Legal Aid Society until December 2017 which he began processing Holly Ondaan's immigration application in July 2017. After leaving The Legal Aid Society and beginning employment with The Commission on Human Rights in January 2018 the application remained opened and Mr. Knabb was unable to complete the fraudulent immigration application. (SEE DETAIL STATEMENT of CLAIM – Section

## B.

Judge Kerrigan assigned as the Judge to review the Special Proceeding too acted beyond the color of law by dismissing my petition in its entirety in favor of New York City Commission on Human Rights. Please note that Zoey Chenitz represented Judge Kerrigan in a Civil Case and was supposed to RECUSE himself from reviewing the Special Proceeding as they share a familial relationship. The relationship between both Ms. Chenitz and Judge Kerrigan is a conflict of interest as outlined in the U.S.C. and resulted in all evidence, motions (equitable tolling), subpoena's (USCIS) and a personal email about the conflict of interest in reference to Ms. Chenitz all were ignored and subpoenas outright not signed without reasoning. With no regard to the Federal Governments directives that the entire matter is fraud Judge Kerrigan overlooked the entire fraud scheme and refuse to have and discussions.

Finally, I was contacted by a well-known Whistle Blower, Everett Stern and Civil Rights Attorney, Brett Klein who too are interesting in pursuing legal action against New York City on my behalf.

Judge Spooner abrupt retirement/resignation on the day the decision was written became the final confirmation of how malicious New York City has been to me and how disgusted the trial Judge was that such a decision was written referring to him with many lies with no regard to my life as a human and mother with a career. Not allowing me to depose the complaint but conducting a deposition on me was grounds for Judge Kerrigan to overturn the decision even if he did not want to discuss the immigration fraud. Instead, he supports his friend Zoey Chenitz and dismissed my petition entirely. The act alone

confirms that Judge Kerrigan acted beyond the bounds of the law and deprived of my rights under the Constitution.

Please review and compare the dates of the Final Decision, Judge Spooner's resignation emails, call detail from DHS & USCIS, as well as the Sprint phone records against the text messages alleged in the complaint. The review of the text messages against the complaint ALONE by any person too will agree that every party acted under the color of law by willfully depriving me my rights and privileges protected under The United States Constitution. As the Courts to address the matter and restore my life.

To further state the request for the federal courts to intervene and grant injunctive relief because of the "extraordinary circumstances existence" which have caused and will continue to cause irreparable injury that will result in my expiration/demise should Eastern District Court do not intervene. The Younger Abstention Doctrine allows for 3 narrow exceptions where the Federal Court can & must intervene. All elements for the intervention are stated below as follows.

1. **Bad Faith:** the state knows the person to be innocent. Which I am innocent my phone records confirmed, followed by Dept of Homeland Security & USCIS Federal Agents confirming the commission of Fraud is the result of the City of New York violating my rights.
2. **Harassment:** Where the prosecution is part of some pattern of harassment against an individual; or continuance of litigating a matter in State Court who too has the authority and jurisdiction to adjudicate federal claims but failed to do so. Judge Kevin Kerrigan failed to do so which is a clear indication that not only did know I was innocence but he too disregards my civil rights and placed me in a position to continuously litigate a matter in State Court of Appeals. If Judge Kevin Kerrigan had done his due diligence as a Judge and adjudicated the matter fairly under the United States Constitution, requesting intervention from the Federal Courts would not have commenced. It is the ultimately result of the State Courts Judge's decision to enforce unusual and cruel punishment with knowledge of my innocence, with no regard to my life to outright violate my civil rights instead of litigating the matter.
3. ***"Extraordinary Circumstances" exist in which irreparable injury can be shown even in the absence of bad faith and harassment, a federal court must intervene by way of granting injunctive or declaratory relief against a state civil proceeding were a person is innocent.*** The law being enforced is flagrantly and patently unconstitutional (e.g., Trying to enforce a decision and order of guilt after subpoenaing my phone records as well as USCIS confirming the commission of immigration fraud at the hands of all parties named in the complaint is extraordinary acts of injustice under United States Constitution. Misconduct in the legal system is beyond doubt an extraordinary circumstance.

Unfair justice has plagued a continued practice confirming bad faith throughout the legal system. The State Court too had the authority and jurisdiction to adjudicate federal claims but failed to do so.

The three factors supporting Younger Abstention exception allowing for the Federal Court to intervene are present in this case without any further questions.

Kugler v. Helfant,

Younger v. Harris,

#### IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Unlawfully terminated from City of New York employment. Defamation of character all over the Internet. Social media resulting in difficulty obtaining employment, benefits & various funds afforded to employees, lost of weight, depression, suicidal thoughts, loss of sleep, deprivation of a normal life, etc...

#### V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Primarily follow USCIS directives  
Subpoena USCIS Records Supporting Claims/Motive  
Reinstatement of all Civil Service employment and rights lost/taken, retro pay, benefits, etc...  
\$1,000,000 for pain and suffering at the hands of City of New York employees  
All parties held accountable according to the law for their malicious acts  
Against my life for deprivation.

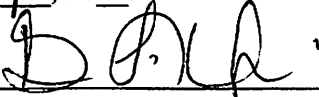
#### VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/15, 2022

Signature of Plaintiff 

Printed Name of Plaintiff Dianna Lysius



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Amended  
Complaint  
Supplement

[Name],

Dianna Kysius  
Plaintiff,

21 cv 7001 ( )

v.

Jury trial demanded

[Name]

Defendant.

Philippe Knabb, Nermina Ornaud, Sapna Raj, Holly, Ondaan  
John B. Spooner, Carmalyn Malalis, Zvezda Chernitz  
City of New York, NYC Commission on Human Rights, NYC Law  
Dept

AMENDED COMPLAINT

Plaintiff, pro se, Dianna Kysius hereby alleges for their Complaint as follows:

1. This case is Complaint for Civil Rights violation & deprivation under 42 U.S.C. 1983

PARTIES

2. Plaintiff Dianna Kysius resides at 1280 Croton Road, 13B Brooklyn NY 11239
3. Defendant is corporation. Defendant resides at State or local agency under direction of City of NY 100 Church Street New York 10007

JURISDICTION

4. This case is brought pursuant to [insert the Family Medical Leave Act and statute]
5. This Court has jurisdiction pursuant to [if fed question and pendent state law claims] 42 USC 1983 Civil Rights acting under color of State/Local Laws

VENUE

6. Venue is proper in the Eastern District of New York because the actions alleged in this

Complaint occurred in this district. The boroughs of Queens NY, New York, NY. See attached occurrence/jurisdiction

STATEMENT OF FACTS

7. The facts See attached Statement of Facts
8. Facts See detail timeline of events Exhibit 1
9. On or about Plaintiff July/August 2017, Dianna Kysius Plaintiff Rights were violated and continued to date.

**PHILIPPE KNABB**

**NERMINA ARNAUD**

**SAPNA RAJ**

**JOHN B. SPOONER**

**CARMALYN MALALIS**

**ZOEY CHENITZ**

**CITY OF NEW YORK**

**NEW YORK CITY COMMISSION ON HUMAN RIGHTS**

**NEW YORK CITY LAW DEPT. on behalf of RESPONDENT as SUPERIOR**

**HOLLY ONDAAN**

10.

**FIRST CLAIM FOR RELIEF:**

Deprivation of 1st Amendment Rights

11. Plaintiff realleges the foregoing paragraphs as if set forth fully herein.

12. Defendant All Parties named in the complaint

13. Plaintiff was harmed defamation, falsely accused, wrong doing

**SECOND CLAIM FOR RELIEF:**

Deprivation/Denial of Due Process 14th Amendment

14. Plaintiff realleges the foregoing paragraphs as if set forth fully herein.

15. Defendant denied me the privilege to depose the adversary, stole my evidence

**THIRD CLAIM FOR RELIEF:**

Impartial Trial Hearing 6th/7th Amendment

16. Plaintiff realleges the foregoing paragraphs as if set forth fully herein.

17. Defendant All parties denied me the immunities afforded from the commencement dating July 2017 - Present.

WHEREFORE, Plaintiff respectfully requests judgment against Defendant as follows:

- A declaration that Defendant violated Plaintiff's rights in violation of All claims to include any additional claims the Court sees
- An order awarding compensatory and punitive damages in an amount to be determined at trial; Not less than \$1,000,000 feasible to obtain.
- Reasonable litigation costs under All Cost
- And an order directing such other relief as this Court deems just and proper, to include employment restate, lost wage benefits

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 7/19/22  
Brooklyn, NY

Dianna Lysius  
NAME, Plaintiff  
Address line 1 1280 Croton Ave  
Address line 2 13B  
Brooklyn, NY 11239  
646-210-7747

and Court & Decist from harassing my life before my life ends as a result.